

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JAMSHID NORYIAN (01)  
a.k.a. JAMES NORYIAN  
DEHSHID NOURIAN (02)  
a.k.a. DAVID NOURIAN  
CHRISTOPHER RYDBERG (03)  
MICHAEL TABA (07)

CRIMINAL NO. 3:17-cr-155-L

**THE UNITED STATES OF AMERICA’S NOTICE OF INTENT TO OFFER  
EVIDENCE PURSUANT TO FEDERAL RULE OF EVIDENCE  
902**

The United States of America hereby notifies the defendants of the Government’s intent to introduce the following evidence by affidavit or declaration under Federal Rules of Evidence 803(6), 902(11), and 902(14), as follows. The below-listed exhibits and certificates were all previously provided to the defendants in discovery.

**A. Business Records Under FRE 902(11)**

The government intends to introduce business records by affidavit or declaration under Rules 803(6) and 902(11) of the Federal Rules of Evidence as follows:

<b>GX</b>	<b>DESCRIPTION</b>	<b>AFFIDAVIT DATE(S)</b>
<b>Secretary of State Records</b>		
<b>101</b>	Ability Secretary of State Filings	12/9/2019
<b>102</b>	Industrial and Family Secretary of State Filings	12/10/2019
<b>103</b>	Park Row Pharmacy Secretary of State Filings	12/9/2019
<b>104</b>	Bandoola Secretary of State Filings	12/9/2019

<b>GX</b>	<b>DESCRIPTION</b>	<b>AFFIDAVIT DATE(S)</b>
<b>105</b>	HJLM Holding LLC Secretary of State Filings	12/9/2019
<b>106</b>	Queen Shiva LLC Secretary of State Filings	12/9/2019
<b>107</b>	Ace Queen LLC Secretary of State Filings	12/9/2019
<b>108</b>	Ace King LLC Secretary of State Filings	12/9/2019
<b>109</b>	Michael Taba M.D. Secretary of State Filings	12/9/2019
<b>110</b>	Magnum Surgical Products LLC Secretary of State Filings	12/9/2019
<b>111</b>	Jade and Joy LLC Secretary of State Filings	12/9/2019
<b>112</b>	Benson Injury Clinic P.A. Secretary of State Filings	12/9/2019
<b>Claims Data</b>		
<b>212</b>	Department of Labor Billing Data for Ability Pharmacy, Inc.	9/20/2022
<b>213</b>	BCBS Billing Data for Ability Pharmacy Inc. and Industrial & Family Pharmacy, LLC	8/11/2023
<b>214</b>	Department of Labor Billing Data for Industrial and Family Pharmacy, LLC	9/20/2022
<b>215</b>	Department of Labor Billing Data for Park Row Pharmacy, LLC	9/20/2022
<b>216</b>	BCBS Billing Data for Park Row Pharmacy, LLC	8/11/2023
<b>217</b>	Department of Labor Third-Party Billing Data for Ability Pharmacy, Industrial and Family Pharmacy, and Park Row Pharmacy	9/20/2022
<b>218</b>	Prime Therapeutics – Ability Pharmacy Claims Data	9/23/2022
<b>226</b>	Optum Records	10/4/2022
<b>Bank Records</b>		
<b>501</b>	Bank Records for Wells Fargo Bank Account Ending in 6919 held in the name of Sherri Mofid	2/3/2017
<b>502</b>	Signature Card for Wells Fargo Account Ending in 6919	2/3/2017
<b>503</b>	September 8, 2014 Check from Sherri Mofid to Michael Taba for \$10,000	2/3/2017

<b>GX</b>	<b>DESCRIPTION</b>	<b>AFFIDAVIT DATE(S)</b>
<b>504</b>	August 14, 2014 Cashier's Check from Sherri Mofid to Michael Taba for \$100,000	2/3/2017
<b>505</b>	September 8, 2014 Cashier's Check Sherrif Mofid to Michael Taba for \$90,000	2/3/2017
<b>506</b>	Financial Records for Scottrade Investment Account Ending in 1792 held in the name of Sherri Mofid	5/27/2016
<b>507</b>	Financial Records for TD Ameritrade Account Ending in 3760 held in the name of Sherri Mofid	4/4/2016
<b>508</b>	Bank Records for Wells Fargo Bank Account Ending in 3649 held in the name of Sherri Mofid	3/9/2016
<b>509</b>	JPMC account ending in 0481 held in the name of Sherri Mofid	6/9/2016
<b>510</b>	Financial Records for Scottrade Investment Account Ending in 1793 held in the Name of Sherri Mofid	5/27/2016
<b>511</b>	Signature Card for Scottrade Account Ending in 1793	5/27/2016
<b>512</b>	January 1-31, 2016 Statement for Scottrade Account Ending in 1793	5/27/2016
<b>513</b>	Bank Records for JP Morgan Chase Account Ending in 5614 held in the name of Michael Taba	10/11/2016
<b>514</b>	Deposit Slip for \$100,000 to Chase Account Ending in 5614	10/11/2016
<b>515</b>	Deposit Slip for \$90,000 to Chase Account Ending in 5614	10/11/2016
<b>516</b>	Deposit Slip for \$10,000 to Chase Account Ending in 5614	10/11/2016
<b>517</b>	Deposit Slip for \$150,000 to Chase Account Ending in 5614	10/11/2016
<b>518</b>	Deposit Slip for \$70,000 to Chase Account Ending in 5614	10/11/2016
<b>519</b>	Deposit Slip for \$136,600 to Chase Account Ending in 5614	10/11/2016
<b>520</b>	Deposit Slip for \$258,000 to Chase Account Ending in 5614	10/11/2016

<b>GX</b>	<b>DESCRIPTION</b>	<b>AFFIDAVIT DATE(S)</b>
<b>521</b>	Withdrawal Slip for \$750,000 from Chase Account Ending in 5614	10/11/2016
<b>522</b>	Bank Records for Wells Fargo Bank Account Ending in 3119 Held in the Name of HJLM, LLC	6/16/2016 & 3/9/2016
<b>523</b>	Bank Records for JP Morgan Chase Account Ending in 2338 held in the name of Michael Taba	10/11/2016
<b>524</b>	Signature Card for Chase Account Ending in 2338	10/11/2016
<b>525</b>	Bank Records for JP Morgan Chase Account Ending in 4105 held in the name of Michael Taba	7/20/2016
<b>526</b>	Bank Records for JP Morgan Chase Account Ending in 9472 held in the name of Michael Taba	12/14/2016
<b>527</b>	Bank Records for Wells Fargo Bank Account Ending in 9217 Held in the Name of Christopher J. Rydberg	6/16/2016 & 3/9/2016
<b>528</b>	Signature Card for Wells Fargo Account Ending in 9217	6/16/2016 & 3/9/2016
<b>529</b>	October 15, 2014 Cashier's Check from Christopher J. Rydberg to Michael Taba for \$150,000	6/16/2016 & 3/9/2016
<b>530</b>	July 8, 2015 Cashier's Check from Christopher J. Rydberg to Magnum Surgical Products (Kevin Williams) for \$279,000	6/16/2016 & 3/9/2016
<b>531</b>	Bank Records for Wells Fargo Bank Account 7909 Held in the Name of Restaurant & Associates, Inc.	6/16/2016 & 3/9/2016
<b>532</b>	Signature Card for Wells Fargo Account Ending in 7909	6/16/2016 & 3/9/2016
<b>533</b>	November 17, 2014 Cashier's Check from Christopher Rydberg to Michael Taba for \$70,000	6/16/2016 & 3/9/2016
<b>534</b>	Bank Records for Wells Fargo Bank Account Ending in 8897 Held in the Name of Bandoola Pharmaceutical, LLC	4/4/2016
<b>535</b>	Signature Card for Wells Fargo Account Ending in 8897	4/4/2016
<b>536</b>	Withdrawal Slip for \$136,630 from Wells Fargo Account Ending in 8897	4/4/2016
<b>537</b>	February 16, 2016 Check from Bandoola Pharmaceutical to Magnum Surgical Products (Kevin Williams) for \$125,000	4/4/2016

<b>GX</b>	<b>DESCRIPTION</b>	<b>AFFIDAVIT DATE(S)</b>
<b>538</b>	Withdrawal Slip for \$381,000 from Wells Fargo Account Ending in 8897	4/4/2016
<b>539</b>	Withdrawal Slip for \$560,000 from Wells Fargo Account Ending in 8897	4/4/2016
<b>540</b>	September 21, 2015 Check from Bandoola Pharmaceutical to Magnum Surgical Products (Kevin Williams) for \$219,000	4/4/2016
<b>541</b>	Withdrawal Slip for \$309,010 from Wells Fargo Account Ending in 8897	4/4/2016
<b>542</b>	April 22, 2015 Check to Nicolas Aguilar for \$10,000	4/4/2016
<b>543</b>	December 2, 2015 Check to Nicolas Aguilar for \$10,000	4/4/2016
<b>544</b>	Bank Records for JP Morgan Chase Account Ending in 6653 Held in the Name of Dr. Leyla Nourian	6/3/2016
<b>545</b>	Signature Card for Chase Account Ending in 6653	6/3/2016
<b>546</b>	Withdrawal Slip for \$108,000 from Chase Account Ending in 6653	6/3/2016
<b>547</b>	Bank Records for Ennis State Bank Account Ending in 7903 Held in the Name of Kevin Williams	11/23/2015
<b>548</b>	Signature Card for Ennis State Bank Account Ending in 7903	11/23/2015
<b>549</b>	Deposit Slip for \$214,000 to Ennis State Bank Account Ending in 7903	11/23/2015
<b>550</b>	Deposit Slip for \$219,000 to Ennis State Bank Account Ending in 7903	11/23/2015
<b>551</b>	Deposit Slip for \$309,000 to Ennis State Bank Account Ending in 7903	11/23/2015
<b>552</b>	Wells Fargo Account Ending in 3119 Held in the Name of HJLM, LLC	6/16/2016 & 3/9/2016

<b>GX</b>	<b>DESCRIPTION</b>	<b>AFFIDAVIT DATE(S)</b>
<b>553</b>	February 2, 2016 Check from HJLM Holding LLC to Lee Diehl for \$2,000	6/16/2016 & 3/9/2016
<b>554</b>	December 29, 2015 Check from HJLM Holding LLC to David McDonald for Draw on Taba Job for \$3,000	6/16/2016 & 3/9/2016
<b>555</b>	January 26, 2016 Check from HJLM Holding LLC to David McDonald for Taba Job for \$5,300	6/16/2016 & 3/9/2016
<b>556</b>	December 17, 2015 Check from HJLM Holding LLC to Jimmy Eaves for Draw on Taba Job for \$5,000	6/16/2016 & 3/9/2016
<b>557</b>	Bank Records for Wells Fargo Bank Account Ending in 0302 held in the name of Industrial & Family Pharmacy	6/16/2016 & 5/27/2016
<b>558</b>	Signature Card for Wells Fargo Account Ending in 0302	6/16/2016 & 5/27/2016
<b>559</b>	December 1-December 15, 2015 Statement for Account Ending in 0302	6/16/2016 & 5/27/2016
<b>560</b>	January 1-January 31, 2016 Statement for Account Ending in 0302	6/16/2016 & 5/27/2016
<b>561</b>	Bank Records for JP Morgan Chase Account Ending in 9863 held in the name of Industrial & Family Pharmacy	11/18/2016
<b>562</b>	Signature Card for JP Morgan Chase Account Ending in 9863	11/18/2016
<b>563</b>	January 19-29, 2016 Statement for JP Morgan Chase Account Ending in 9863	11/18/2016
<b>564</b>	Bank Records for JP Morgan Chase Account Ending in 3462 held in the name of Jade and Joy, LLC	3/28/2016
<b>565</b>	Signature Card for JP Morgan Chase Account Ending in 3462	3/28/2016
<b>566</b>	January 1-29, 2016 Statement for JP Morgan Chase Account Ending in 3462	3/28/2016
<b>567</b>	May 1-29, 2015 Statement for JP Morgan Chase Account Ending in 3462	3/28/2016

<b>GX</b>	<b>DESCRIPTION</b>	<b>AFFIDAVIT DATE(S)</b>
<b>568</b>	September 1-30, 2015 Statement for JP Morgan Chase Account Ending in 3462	3/28/2016
<b>569</b>	October 30-November 30, 2015 Statement for JP Morgan Chase Account Ending in 3462	3/28/2016
<b>570</b>	May 30-June 30, 2015 Statement for JP Morgan Chase Account Ending in 3462	3/28/2016
<b>571</b>	July 1-31, 2015 Statement for JP Morgan Chase Account Ending in 3462	3/28/2016
<b>572</b>	Bank Records for Prosperity Bank Account Ending in 9542 held in the name of Ability Pharmacy, Inc.	6/25/2015 & 3/22/2016
<b>573</b>	Signature Card for Prosperity Bank Account Ending in 9542	6/25/2015 & 3/22/2016
<b>574</b>	Excerpt from January 31, 2016 Statement for Prosperity Bank Account Ending in 9542	6/25/2015 & 3/22/2016
<b>575</b>	Excerpt from October 31, 2015 Statement for Prosperity Bank Account Ending in 9542	6/25/2015 & 3/22/2016
<b>576</b>	Excerpt from November 30, 2015 Statement for Prosperity Bank Account Ending in 9542	6/25/2015 & 3/22/2016
<b>577</b>	Bank Records for JP Morgan Chase Account Ending in 2280 held in the Name of Ability Pharmacy, Inc.	7/3/2015, 9/9/2015, & 3/29/2016
<b>578</b>	JP Morgan Chase Signature Card for Account Ending in 2280	7/3/2015, 9/9/2015, & 3/29/2016
<b>579</b>	January 1-January 29, 2016 Statement for JP Morgan Chase Account Ending in 2280	7/3/2015, 9/9/2015, & 3/29/2016
<b>580</b>	May 1-May 29, 2015 Statement for JP Morgan Chase Account Ending in 2280	7/3/2015, 9/9/2015, & 3/29/2016
<b>581</b>	October 1-30, 2015 Statement for JP Morgan Chase Account Ending in 2280	7/3/2015, 9/9/2015, & 3/29/2016

<b>GX</b>	<b>DESCRIPTION</b>	<b>AFFIDAVIT DATE(S)</b>
<b>582</b>	October 31-November 30, 2015 Statement for JP Morgan Chase Account Ending in 2280	7/3/2015, 9/9/2015, & 3/29/2016
<b>583</b>	September 1-30, 2015 Statement for JP Morgan Chase Account Ending in 2280	7/3/2015, 9/9/2015, & 3/29/2016
<b>584</b>	Bank Records for Prosperity Bank Account Ending in 6341 held in the name of Ability Pharmacy, Inc.	6/25/2015 & 3/22/2016
<b>585</b>	Signature Card for Prosperity Bank Account Ending in 6341	6/25/2015 & 3/22/2016
<b>586</b>	Excerpt from April 30, 2015 Statement for Prosperity Bank Account Ending in 6341	6/25/2015 & 3/22/2016
<b>587</b>	Excerpt from May 31, 2015 Statement for Prosperity Bank Account Ending in 6341	6/25/2015 & 3/22/2016
<b>588</b>	Bank Records for Bank of America Account Ending in 5271 held in the name of Ability Pharmacy, Inc.	9/11/2018
<b>589</b>	Signature Card for Bank of America Account Ending in 5271	9/11/2018
<b>590</b>	October 1-31, 2015 Statement for Bank of America Account Ending in 5271	9/11/2018
<b>591</b>	Transaction Logs for 8 Cashier's Checks from Bank of America Account Ending in 5271	9/11/2018
<b>592</b>	Bank Records for JP Morgan Chase Account Ending in 3691 held in the name of Ability Pharmacy	7/13/2015
<b>593</b>	Bank Records for Wells Fargo Bank Account Ending in 6032 held in the name of Dehshid Nourian	5/27/2016
<b>594</b>	Signature Card for Wells Fargo Account Ending in 6032	5/27/2016
<b>595</b>	January 1-31, 2016 Statement for Wells Fargo Account Ending in 6032	5/27/2016
<b>596</b>	Financial Records for TD Ameritrade Account Ending in 8494 held in the name of Dehshid Nourian	4/4/2016
<b>597</b>	Signature Card for TD Ameritrade Account Ending in 8494	4/4/2016
<b>598</b>	January 2016 Statement for TD Ameritrade Account Ending in 8494	4/4/2016

<b>GX</b>	<b>DESCRIPTION</b>	<b>AFFIDAVIT DATE(S)</b>
<b>599</b>	Financial Records for Scottrade Investment Account Ending in 7680 held in the name of Dehshid Noryian	5/27/2016
<b>600</b>	Bank Records for Bancorp South Account Ending in 5371 held in the name of Bandoola Pharmacy	3/22/2016
<b>601</b>	Signature Card for BancorpSouth Bank Ending in 5371	3/22/2016
<b>602</b>	July 21, 2015 Statement for BancorpSouth Bank Account Ending in 5371	3/22/2016
<b>603</b>	September 30, 2015 Statement for BancorpSouth Bank Account Ending in 5371	3/22/2016
<b>604</b>	November 30, 2015 Statement for BancorpSouth Bank Account Ending in 5371	3/22/2016
<b>605</b>	Bank Records for JP Morgan Chase Account Ending in 7273 held in the name of Jade and Joy, LLC	6/3/2016 & 10/3/2016
<b>606</b>	Signature Card for JP Morgan Chase Account Ending in 7273	6/3/2016 & 10/3/2016
<b>607</b>	June 12-30, 2015 Statement for JP Morgan Chase Account Ending in 7273	6/3/2016 & 10/3/2016
<b>608</b>	July 1-31, 2015 Statement for JP Morgan Chase Account Ending in 7273	6/3/2016 & 10/3/2016
<b>609</b>	Bank Records for BBVA Compass Account Ending in 4076 held in the name of Park Row Pharmacy	6/6/2016
<b>610</b>	Bank Records for Wells Fargo Bank Account Ending in 2629 held in the name of Park Row Pharmacy	6/16/2016 & 3/27/2017
<b>611</b>	Bank Records for JP Morgan Chase Account Ending in 1940 held in the name of Nourian Dental	6/3/2016
<b>612</b>	Churchill Management Business Records for James Noryian, Dehshid Noryian, & Sherri Mofid	9/22/2022
<b>613</b>	Churchill Mgmt CRM Notes	4/5/2017

<b>GX</b>	<b>DESCRIPTION</b>	<b>AFFIDAVIT DATE(S)</b>
<b>614</b>	Bank Records for JP Morgan Chase Account Ending in 4105 held in the name of Michael Taba (Refresh)	5/10/2023
<b>615</b>	Wells Fargo Acct 2629 - Christopher Rydberg Refresh	1/22/2022
<b>Tax Records</b>		
<b>626</b>	Ability Pharmacy 2015 Form 1120S	8/1/2023
<b>627</b>	Ability 2015 Transcript of Account	8/1/2023
<b>628</b>	Ability 2016 Form 1120S	8/1/2023
<b>629</b>	Second Ability Pharmacy 2016 Form 1120S	8/1/2023
<b>630</b>	Ability 2016 Transcript of Account	8/1/2023
<b>631</b>	2015 General Ledger for Ability Pharmacy	8/1/2023
<b>632</b>	Industrial & Family Pharmacy 2015 Form 1120S	8/1/2023
<b>633</b>	Industrial & Family Pharmacy 2015 Transcript of Account	8/1/2023
<b>634</b>	Industrial & Family Pharmacy Form 1120S 2016 Lack of Records	8/1/2023
<b>635</b>	Industrial & Family Pharmacy 2016 Transcript of Account	8/1/2023
<b>636</b>	2015 Industrial & Pharmacy - Signature Form - Form 8879-S	8/1/2023
<b>637</b>	2016 Industrial & Family Pharmacy - Signature Form - Form 8879-S	8/1/2023
<b>638</b>	2015 General Ledger for Industrial & Family Pharmacy	8/1/2023
<b>639</b>	2016 General Ledger for Industrial & Family Pharmacy	8/1/2023
<b>640</b>	Park Row 2015 Form 1120S	8/1/2023
<b>641</b>	Park Row 2015 Transcript of Account	8/1/2023
<b>642</b>	Park Row 2016 Form 1120S	8/1/2023
<b>643</b>	Park Row 2016 Transcript of Account	8/1/2023
<b>644</b>	Park Row 2015 BBVA Compass & Wells Fargo Bank Records	8/1/2023
<b>645</b>	2015 Park Row Pharmacy - Signature Form - Form 8879-S	8/1/2023
<b>646</b>	2016 Park Row Pharmacy - Signature Form - Form 8879-S	8/1/2023
<b>647</b>	2015 General Ledger for Park Row Pharmacy	8/1/2023
<b>648</b>	2016 General Ledger for Park Row Pharmacy	8/1/2023
<b>649</b>	Dehshid Nourian 2015 Form 1040	8/1/2023
<b>650</b>	Dehshid Nourian Form 1040 2015 (with signatures)	8/1/2023
<b>651</b>	Dehshid Nourian 2015 Transcript of Account	8/1/2023

<b>GX</b>	<b>DESCRIPTION</b>	<b>AFFIDAVIT DATE(S)</b>
<b>652</b>	Dehshid Nourian 2016 Form 1040	8/1/2023
<b>653</b>	Dehshid Nourian Form 1040 2016 (with signatures)	8/1/2023
<b>654</b>	Deshid Nourian 2016 Transcript of Account	8/1/2023
<b>655</b>	Dehshid & A Pirnajmeddin Nourian 2015 Form 4549	8/1/2023
<b>656</b>	2015 Dehshid Nourian - Signature Page - Form 8879	8/1/2023
<b>657</b>	2016 Dehshid Nourian - Signature Page - Form 8879	8/1/2023
<b>658</b>	Ali Khavaramanesh 2015 Form 1040	8/1/2023
<b>659</b>	Ali Khavaramanesh 2015 Transcript of Account	8/1/2023
<b>660</b>	Ali & Mastaneh Sarra Khavaramanesh 2015 Form 4549	8/1/2023
<b>661</b>	Robert Ritter 2015 Form 1040	8/1/2023
<b>662</b>	Robert Ritter 2015 Transcript of Account	8/1/2023
<b>663</b>	Robert Ritter 2015 Form 4549	8/1/2023
<b>664</b>	Julie Ritter 2015 From 1040	8/1/2023
<b>665</b>	Julie Ritter 2015 Transcript of Account	8/1/2023
<b>666</b>	Julie Ritter 2015 Form 4549	8/1/2023
<b>667</b>	Bandoola 2015 Form 1065	8/1/2023
<b>668</b>	Bandoola 2015 Transcript of Account	8/1/2023
<b>669</b>	Bandoola 2016 Form 1065	8/1/2023
<b>670</b>	Bandoola 2016 Transcript of Account	8/1/2023
<b>671</b>	HJLM 2015 Form 1065	8/1/2023
<b>672</b>	HJLM 2015 Transcript of Account	8/1/2023
<b>673</b>	HJLM 2016 Form 1065	8/1/2023
<b>674</b>	HJLM 2016 Transcript of Account	8/1/2023
<b>675</b>	Jade and Joy 2015 Form 1065	8/1/2023
<b>676</b>	Jade and Joy 2015 Transcript of Account	8/1/2023
<b>677</b>	Jade and Joy 2016 Form 1065	8/1/2023
<b>678</b>	Jade and Joy 2016 Transcript of Account	8/1/2023
<b>679</b>	Christopher Rydberg 2015 Form 1040	8/1/2023
<b>680</b>	Christopher Rydberg 2015 Transcript of Account	8/1/2023
<b>681</b>	Jamshid Noryian Form 1040 2015 Certification Lack of Records	8/1/2023
<b>682</b>	Jamshid Noryian 2015 Transcript of Account	8/1/2023
<b>683</b>	Chase 2015 Expenses	8/1/2023
<b>Audio Recordings</b>		
<b>914</b>	Recorded Conversation – James Noryian and Jared Haggard 10.05.15	9/30/2022
<b>917</b>	Recorded Conversation – Dehshid Nourian and Jeff Byrum 01.26.16	9/28/2022
<b>Miscellaneous Records</b>		
<b>923</b>	Mailbox Service Agreement signed by Leyla Nourian	3/17/2017

<b>GX</b>	<b>DESCRIPTION</b>	<b>AFFIDAVIT DATE(S)</b>
<b>Titles</b>		
<b>927</b>	Stewart Title - 217 Bella Riva	7/14/2016
<b>928</b>	Alamo Title - 2525 Handley - Leyla Nourian	08/4/2016
<b>929</b>	Rattikin Title - Van Alstyne - Sherri Mofid	5/11/2016
<b>930</b>	Autobahn BMW	4/6/2017

**B. Data Authenticated by a Process of Digital Identification Under FRE 902(14)**

Further, the government notifies the defendant of its intent to introduce data copied from an electronic device, storage medium, or file as authenticated by a process of digital identification, by affidavit or declaration under 902(11) and 902(14) of the Federal Rules of Evidence as follows:

<b>Government Exhibit(s)</b>	<b>Description</b>	<b>Affidavit Date</b>
<b>Emails and Text Messages</b>		
<b>701</b>	Email from Kimberly McCoy to Melissa Sumerour Regarding Shuttle to Cowboys Game	9/27/2022
<b>702</b>	Email from Bernadette Hookham to Kimberly McCoy to Regarding New Clinic for Dr. Benson	9/27/2022
<b>709</b>	Email from Mike Benson to Kimberly McCoy Regarding Script Pad	9/27/2022
<b>710</b>	Email from Christopher Rydberg to Himself Regarding Magnum Surgical Products	9/27/2022
<b>722</b>	April 2016 Text Messages between Kimberly McCoy and Jamshid Noryian	9/27/2022
<b>723</b>	May 2016 Text Messages between Kimberly McCoy and Jamshid Noryian	9/27/2022
<b>724</b>	September 2015 Text Messages between Kimberly McCoy and Megan Marines	9/27/2022
<b>725</b>	January 2016 Text Messages between Kimberly McCoy and Hump Vangieson	9/27/2022

(continued on the next page)

Respectfully submitted,

LEIGHA SIMONTON  
UNITED STATES ATTORNEY

GLENN S. LEON  
CHIEF, FRAUD SECTION

/s/ Ethan T. Womble

---

ETHAN T. WOMBLE  
EDWARD E. EMOKPAE  
ALEXANDER T. POGOZELSKI  
Trial Attorneys  
Fraud Section, Criminal Division  
U.S. Department of Justice  
1100 Commerce Street, 3<sup>rd</sup> Floor  
Dallas, TX 75242  
Phone: (202) 674-5653  
ethan.womble@usdoj.gov